

April 20, 2025

**VIA ECF – FILED UNDER SEAL**

Honorable Michael E. Farbiarz  
United States District Judge  
District of New Jersey  
U.S. Post Office & Courthouse  
Newark, New Jersey 07101

**Re: Khalil v. Trump, et al., No. 2:25-cv-1963 (MEF) (MAH)**

Dear Judge Farbiarz:

Petitioner respectfully writes to provide urgent information to the Court regarding Petitioner and his family which is relevant to this Court's consideration of Petitioner's pending Motion for Release ("Bail Motion"), ECF 93.<sup>1</sup> At approximately 8 a.m. ET, Petitioner's wife went into labor and she has been admitted to a hospital in New York City to give birth to their family's first child. As this Court is aware, the impending birth of their child – which had been anticipated to occur on April 28 – was a central ground upon which Petitioner sought bail from this Court, so he can be present to emotionally and physically support his wife and their newborn child during this pivotal moment for their family. As the birth is happening eight days earlier than expected, Petitioner's request has become obviously urgent.

Petitioner's counsel emailed the New Orleans Field Office Director for ICE Enforcement and Removal Operations at approximately 11:35 a.m. ET today, to request a two-week long furlough for Petitioner so he can be with his wife and his newborn child. Still, given the uncertainty of that request, and the meritorious and now even more urgent nature of his Bail Motion, Petitioner respectfully reiterates his request that the Court grant that motion as soon as possible.

Respectfully submitted.

/s/ Baher Azmy

AMERICAN CIVIL LIBERTIES UNION OF NEW JERSEY FOUNDATION  
Jeanne LoCicero  
Farrin R. Anello  
Molly K.C. Linhorst  
570 Broad Street, 11th Floor  
Newark, New Jersey 07102  
973-854-1715

CENTER FOR CONSTITUTIONAL RIGHTS  
Baber Azmy  
Samah Sisay\*  
Diala Shamas\*  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6464

<sup>1</sup> Petitioner has filed this request under seal given the need for the family's privacy and security and will file the appropriate motion seeking leave of court pursuant to D.N.J. Local Rule 5.3.

NEW YORK CIVIL LIBERTIES UNION  
FOUNDATION  
Amy Belsher\*  
Robert Hodgson\*  
Veronica Salama\*  
Molly Biklen\*  
125 Broad Street, 19th Floor  
New York, N.Y. 10004  
Tel: (212) 607-3300

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
Omar Jadwat  
Noor Zafar\*  
Sidra Mahfooz\*  
Brian Hauss\*  
Esha Bhandari\*  
Vera Eidelman\*  
Tyler Takemoto\*  
Brett Max Kaufman\*  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel: (212) 549-2500

CLEAR PROJECT  
MAIN STREET LEGAL SERVICES, INC.  
Ramzi Kassem\*  
Naz Ahmad  
Shezza Abboushi Dallal\*  
CUNY School of Law  
2 Court Square  
Long Island City, NY 11101  
Tel: (718) 340-4558

WASHINGTON SQUARE LEGAL SERVICES, INC.  
Alina Das\*  
Immigrant Rights Clinic  
245 Sullivan Street, 5th Floor  
New York, New York 10012  
Tel: (212) 998-6430

DRATEL & LEWIS  
Amy E. Greer  
29 Broadway, Suite 1412  
New York, NY 10006  
Tel: (212) 732-8805  
Fax: (212) 571-3792

VAN DER HOUT LLP  
Marc Van Der Hout (CA Bar #80778)\*  
Johnny Sinodis (CA Bar #290402)\*  
Oona Cahill (CA Bar #354525)\*  
360 Post St., Suite 800  
San Francisco, CA 94108  
Tel: (415) 981-3000  
Fax: (415) 981-3003

\* *Appearing Pro hac vice*

*Counsel for Petitioner*